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March 13, 2023

**VIA ECF AND EMAIL**

The Honorable Jennifer L. Rochon  
United States District Judge  
U.S. District Court for the Southern District of New York  
500 Pearl Street, Room 1920  
New York, NY 10007

**Re: *Lewis v. Samsung Electronics America, Inc.*, No. 1:22-cv-10882-JLR**

Dear Judge Rochon:

We represent Defendant Samsung Electronics America, Inc. in the above-referenced matter and write jointly with Plaintiff's counsel to request certain scheduling changes pending the outcome of Defendant's anticipated motion to compel arbitration.

Under the Court's Order dated January 4, 2023 (Doc. 5), the parties' initial pretrial conference is set for March 22, 2023, and the parties' deadline to file their joint letter and proposed Civil Case Management Plan and Scheduling Order is seven days earlier, or March 15, 2023. In addition, pursuant to Defendant's executed Waiver of the Service of Summons (Doc. 6), the Defendant's deadline to respond to the Complaint is May 1, 2023. Defendant intends to move to compel arbitration of Plaintiff's claims on that date.

In light of Defendant's forthcoming motion to compel arbitration, and in the interest of judicial economy, the parties respectfully request the following:

First, the parties request that Defendant's deadline to respond to the Complaint be further extended until 30 days after the resolution of Defendant's motion to compel arbitration.

Second, the parties request that the Court stay discovery in this action pending the resolution of Defendant's motion to compel arbitration; and in the event Defendant's motion to compel arbitration is denied, the parties request that the Court stay discovery pending the resolution of any subsequent motion to dismiss.

Third, the parties request that the Court vacate or, in the alternative, defer the initial pretrial conference and the parties' deadline to file their joint letter and proposed Civil Case Management Plan and Scheduling Order, pending the outcome of Defendant's motion to compel arbitration.



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Should the Court deny Defendant's motion to compel arbitration, the parties would promptly move this Court thereafter to request a new date for the initial pretrial conference.

Fourth, although the parties do not believe that judicial economy would be served by setting an initial pretrial conference date at this time, pursuant to Individual Rule of Practice in Civil Cases 1.F, the parties nevertheless propose the following mutually agreeable conference dates: July 12, 19, or 26, 2023.

Finally, the parties propose the following deadlines for the motion to compel arbitration:

May 1, 2023: Defendant's motion to compel arbitration;

June 15, 2023: Plaintiff's opposition; and

June 30, 2023: Defendant's reply.

This is the first extension request from either party. And aside from the conference and deadlines mentioned above, the Court has not set any other deadlines in this matter. Thank you for the time and consideration.

Respectfully,

/s/ Hannah Chanoine


Hannah Chanoine  
Counsel for Defendant

The parties' request is GRANTED. In light of Defendant's contemplated motion to compel arbitration, IT IS HEREBY ORDERED that the Initial Pretrial Conference and corresponding deadlines, and Defendant's deadline to respond to the Complaint, are adjourned without date. Further, in light of the parties' consent, discovery is stayed pending resolution of the motion to compel. Defendant shall file its motion to compel no later than **May 1, 2023**. Plaintiff shall file its opposition no later than **June 15, 2023**, and Defendant shall file its reply, if any, no later than **June 30, 2023**.

Dated: March 14, 2023

New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
United States District Judge